

Exhibit 7

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

EFFYIS, INC., a Michigan corporation,
And HOTTOLINK, INC., a Japanese
Corporation,

CASE NO. 18-CV-13391

Hon. Robert H. Cleland

Plaintiffs/Counter-Defendants,

DECLARATION OF LOUIS J. LICATA

v.

DARREN KELLY, an individual,

Defendant/Counter-Plaintiff.

LOUIS J. LICATA, having been first duly cautioned and sworn on oath, according to law, deposes and says:

1. I am one of the attorneys for the Plaintiffs in the above-captioned action.
2. I am a member of the Ohio Bar, having been first licensed in November 1983.
3. I am a member of the Bars of the United States Supreme Court (1988), the United States Court of Appeals for the Sixth Circuit, and the United States District Courts for the Northern District and Southern District of Ohio.

4. I have been admitted pro hac vice in a number of other State and Federal jurisdictions.

5. I am a graduate of the University of Virginia School of Law (1983).

6. I worked for Jones Day as a paralegal and summer associate from 1980-1982 and for Arter Hadden as an associate from 1983-1990.

7. In 1990, I started the predecessor firm to Licata & Associates Co., LPA where I have been the President and managing owner for twenty-six (26) years.

8. I am a member of the Ohio State Bar Association of its Labor and Employment Law section.

9. I taught several courses at the Cleveland State University Marshall College of Ohio for ten (10) years, and for the last fifteen (15) years I have been a faculty member at the University of Phoenix teaching undergraduate and graduate level law courses, including business law and employment law.

10. Although I am certified as a specialist in labor and employment, my practice is not and never has been limited to that area of law. In fact, one third (1/3) of my time is devoted to corporate transactions, which includes corporate formation and asset protection. I have considerable experience in protecting and piercing the corporate veil matters for clients.

11. I have litigated and tried more than one hundred (100) civil cases to a jury and more than fifty (50) civil cases to the bench, in Ohio and the United States District Courts in Ohio.

12. The claims I have tried in civil cases on behalf of both plaintiffs and defendants include, R.I.C.O., fraud, breach of fiduciary duties, employment discrimination, wrongful discharge, federal civil rights, breach of contract and tort claims. I also served as Co-Counsel in defense of the first criminal R.I.C.O claim prosecuted under the Ohio Statute.

13. I have testified as an expert witness on the reasonableness of attorney fees and legal malpractice.

14. In the case of *Rui He, et al. v. Davor Rom, et al.*, United States District Court for the N.D. of Ohio, C.D, (2016) the court found my then hourly rate of \$395 per hour was reasonable.

15. My current hourly rate, which has been in effect from 2014 through the present, is \$395. That rate was set before I became involved in the above-captioned action.

16. I am familiar with the hourly rates charged by attorneys who have experience similar to mine in Northeast Ohio. My hourly rate is similar to those of such attorneys.

17. The 2013 Ohio State Bar Association publication, *The Economics of Law Practice in Ohio in 2013*, shows that law firms of three-to-six attorneys charged hourly rates up to \$400; attorneys with 36 or more years of experience charged hourly rates up to \$400; and suburban Cleveland attorneys charged hourly rates up to \$450.

18. I spent approximately one hundred sixty-eight (168) hours on procedures related to the collection, review, and production of documents responsive to requests for production in the above-captioned action for which the Plaintiffs incurred \$66,600 of legal fees.

19. The time described above was billed in increments of 1/10 hour, is not excessive, and, in my opinion, is reasonable.

20. I furthermore attest that Rochelle Lurie was at all times relevant hereto an Associate employed by my law firm, Licata Law Group.

21. Rochelle performed document review services for the Plaintiffs in the above-captioned matter.

22. Rochelle is a member of the Ohio Bar, having been first licensed in November 1985.

23. Rochelle is a graduate of Cleveland-Marshall College of Law (1985).

24. Rochelle worked as a Public Defender for fourteen (14) years and as Trial Counsel for Allstate for two (2) years.

25. Rochelle has been an Associate employed by Licata Law Group since 2010.

26. Rochelle's current hourly rate, which has been in effect from 2010 through the present, is \$150. That rate was in effect before Rochelle became involved in the above-captioned matter.


27. I am familiar with the hourly rates charged by attorneys who have experience similar to Rochelle in Northeast Ohio. Her hourly rate is similar to those of such attorneys.

28. Rochelle spent approximately one hundred fifty-six (156) hours on procedures related to the collection, review, and production of documents responsive to requests for production in the above-captioned action for which the Plaintiffs incurred \$23,400 of legal fees.

29. The time described above was billed in increments of 1/10 hour, is not excessive, and, in my opinion, is reasonable.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 27 day of November, 2019



Louis J. Licata